

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

UNITED STATES OF AMERICA

v.

DIQUIS MANLY

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CRIMINAL NO. 5:23-cr-00002

FACTUAL STATEMENT IN SUPPORT OF PLEA AGREEMENT

The United States of America, by and through Alamdar S. Hamdani, United States Attorney for the Southern District of Texas and **Brandon Bowling**, Assistant United States Attorney, and the defendant, **DIQUIS MANLY** and the defendant's counsel, hereby stipulate as follows:

I.

If this case proceeded to trial, the United States of America would prove each element of the offense beyond a reasonable doubt. The following facts, among others, would be offered to establish the Defendant's guilt:

II.

On December 21, 2022, **DIQUIS MANLY** and a passenger arrived at the Border Patrol Checkpoint located near the 29-mile marker of Interstate Highway-35 (IH-35) north of Laredo, Texas, in Webb County in a black dully pickup hauling a gooseneck trailer with two vans loaded on them when they were referred to the secondary area due to a canine alert and observed fogging of windows in the vans. **DIQUIS MANLY** was the driver of the pickup. After driving through the scanner **DIQUIS MANLY** left the checkpoint. A BPA activated his emergency lights and siren in the attempt to catch up to the pickup truck. A BPA initiated a vehicle stop at roughly the 31-mile marker northbound on IH-35.

Once the black dully pickup hauling a gooseneck trailer came to a stop, a BPA walked to the trailer and climbed on it noticing the windows on the rear van were foggy. A BPA used his flashlight to see into the rear van and saw people hiding under blankets. The two vans on the trailer were locked; however, the keys to both vans were found inside the black dully pickup truck in a compartment on the dashboard. Using the keys, a BPA was able to open both vans and get the people out of the vans. A total of 19 people were in the vans who were all determined to be undocumented aliens without permission to enter, travel through, or remain in the United States were located in the locked vans.

Following rights advisement and waiver, **DIQUIS MANLY** stated to Homeland Security Investigations agents that he and the passenger had made plans to drive down to Laredo, Texas so **DIQUIS MANLY** could find a "trip". **DIQUIS MANLY** stated that while at a Pilot located near Laredo, Texas they were approached by two unknown males and asked if they wanted to make some extra money. **DIQUIS MANLY** stated that the one of the males told him they would be paid \$3,000 to transport three undocumented noncitizens to San Antonio, Texas. **DIQUIS MANLY** further stated that he and the passenger agreed to smuggle the aliens. **DIQUIS MANLY** stated that that as he and the passenger walked out of the store and he observed the two males indicate that the aliens were loaded in the vehicles, and they were ready to go. **DIQUIS MANLY** stated that they continued their way north on IH-35 until reaching the checkpoint.


Two of the aliens located, a Luis Miguel HENRIQUEZ-Velasquez and Vladimir Federico VELASQUEZ-Merino, both citizens of El Salvador respectively and illegally present in the United States stated that they illegally entered the United States by way of Mexico. Both witnesses stated arrangements were made with members of a human smuggling organization for them to be smuggled into the United States and transported to cities within the interior of the United States in exchange for smuggling fees. Both witnesses stated that on December 21, 2022, they were told to

get into one of the vans on the flatbed trailer by males in the smuggling organization to be smuggled into the interior of the United States and remained in the vehicles until they were arrested.

Therefore, **DIQUIS MANLY** admits, and the facts show that he made an agreement with the passenger and at least one other person to transport or move the material witnesses in furtherance of their arrangements to be to be transported into the United States and to their final destination in the interior of the United States.

III.

Defendant, **DIQUIS MANLY**, hereby confesses and judicially admits that on **December 21, 2022**, he knowingly conspired to transport an undocumented alien within the United States, in violation of **Title 8, United States Code, Sections 1324 (a)(1)(A)(ii) and (v)(I)**.




DIQUIS MANLY
Defendant

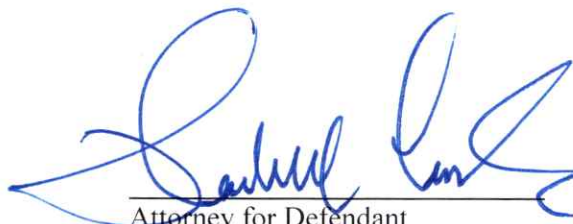
APPROVED:

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY

By:



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